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INTRODUCTION

The comments in this paper are intended to present what I perceive to be problems, caused by lack of clearly defined policy in the position management and position classification functions of this Agency. The scope of the problems, which extend to every sector and every level of the Agency, are far too great to be covered in detail here. A major staff study by personnel management analysts would be needed to complete this project. My objective is to merely alert you to areas in which I believe the Agency could be subject to unnecessary external criticism, and having potential to cause losses of authority, or imposed policy in some areas of personnel and position management.

I have worked 17 years in C.I.A. and hold it and its missions in general high regard. Yet, the professional frustrations caused by the lack of effective personnel management policy, incompetence, and mismanagement in personnel/position management leaves me no recourse but to attempt to find other employment. Should those efforts fail, and this paper is unfavorably received, I suppose this effort will endanger what may be left of my career in this Agency. Yet, personal integrity, professional pride and conscience force this submission, in the hope that my concerns might be shared and some action be taken to correct the apparent problems.

This plea is on behalf of the Agency as well as myself. There is no need to wait until forces from outside the Agency cause us to change our programs, we have the authorities to do so without those pressures. This is also a personal plea, seeking a reason to remain aboard and complete my Federal career with the Agency.

POSITION CLASSIFICATION AUTHORITY

Problem: Current policy is implicit, not specific.

PL-110 gives the DCI authority to establish position and pay policy for the Agency. We of course accept that to be specific assignment of position classification authority.

STATINTEL [] implies, but does not state that the Director of Personnel is delegated position classification authority. If the intent of the regulation is to actually delegate such authority, it is seldom, if ever exercised in a meaningful manner. Classification determinations are resolved on the basis of negotiations, personal politics, or apparent political strength of the affected manager. Merit is of marginal concern. All position grade allocations have political connotations. Disputed allocations are pigeonholed. Reference can be made to OP/Position Management and Compensation Division (PMCD) survey reports from approximately 1972 to present. Compare the findings with the number of actions implemented.

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NOTE: The preceding is not necessarily a criticism of the Director of Personnel. I am not certain that he recognizes the problem. Neither am I certain that he is clear as to the extent of his authorities, nor how he is expected to exercise them.

Resolution of position classification controversies have been resolved for too long according to compromise and interpersonal politics. Significant inequitable, or questionable cases remain on the record without apparent concern or intent to resolve them. This process, coupled with lack of senior management direction has so eroded the validity of the Agency position classification program that the system lacks credibility.

Solution Needed: If there is senior management concern about the need for integrity in the program, then there is need for in-depth definition of policy, program content and delegations of authority, combined with operating directions which define the kind of results expected.

POSITION CLASSIFICATION POLICY

STATINTEL

Problem: We have no effective policy.

[] provides that "it is Agency policy to follow the concepts and principles of the Classification Act of 1949, as amended . . ." That phrase is supplemented by additional statements of philosophy and a list of conditions of employment which may have impact on position grades. In no part of our regulations, handbooks, operating procedures, or practices is there a clue as to the degree to which those principles and practices will be followed.

Solution needed: There is need for specific policy which defines the degree to which we will or will not follow the concepts and principles of the Classification Act of 1949, as amended.

CLASSIFICATION APPEALS

Problem: Agency regulations do not inform employees or supervisors about a right or channel to appeal classification actions.

Appeal rights are fundamental to classification throughout the Government. We in OP have assumed that employees have such entitlements and on the infrequent occasions an action is appealed, that appeal is honored. The Office of Personnel conducts an appeal review in a semblance of the procedures found elsewhere. There is no effective appeal beyond the Director of Personnel and that is unusual.

Solution Needed: We need a statement of policy which defines:

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The right to appeal a position classification action.

Definition of the grounds on which an appeal may be made.

The channel through which the appeal is to be submitted, and who may so originate.

A reasonable time frame during which an appeal must be submitted.

The levels at which an appeal may be resolved.

The highest and final level beyond which an appeal may not be pursued.

POSITION MANAGEMENT

STATINTL Problem: There is no effective position management program in C.I.A.

[] gives to the Director of Personnel responsibility for administration of the Agency's position management program. The Director of Personnel has been given responsibility in an area in which there is no apparent program. Fragments of position management review and analysis are conducted through the efforts of the Audit Staff and PMCD, and to a minor degree the Office of the Comptroller. None of those elements is fully qualified, or capable within existing resources or charter to conduct comprehensive and effective position management analysis. There is weakness of policy, lack of objectives, lack of guidelines, absence of reporting channels and no focus of authority or method of implementation.

Solution Needed: There is need for policy direction to give definition to a position management program including; the content; statement of objectives; assignment of responsibility to conduct the analysis; whether it will be conducted from a central staff or be separate, joint, or coordinated efforts by more than one staff; to whom the results will be reported; and, identification of authority, or delegation to implement findings.

CLASSIFICATION STANDARDS

Problem: Only those Civil Service published standards which tend to support upgrade actions may be applied to General Schedule positions in C.I.A.

We are told that Agency positions are "unique" and the published standards do not cover their content or functions, therefore they may not be applied. PMCD findings, which are not normally published, indicate that a majority of Agency positions fit within the criteria in the published standards and are comparable in functions to positions in other agencies. In some career fields, the only unique aspects of our positions are their exceedingly high grades.

As a result of a study prepared for Mr. Blake by [REDACTED] and a recommendation made in the most recent IG survey of the Office of Personnel, PMCD has embarked on a standards development effort. The objective of that effort is to adapt the recently developed Factor Evaluation System of Position Classification (FES) to Agency positions. There are problems of analysis and adjustment involved in adapting the criteria to the Agency, but in general the system is as applicable to our positions as to other agencies.

I believe there is an assumption on the part of Agency managers that the FES will provide support for current or even higher position grades in the Agency. We can already determine that the results will be mixed, perhaps with a tendency to cause more downgrade actions than to sustain or raise current grades. Those same results could be achieved with currently available standards. Therefore, having no better base in policy direction than at present, we can safely forecast that the "new" FES standards efforts are doomed in infancy. The deficiencies and inequities currently extant will not be corrected.

Solution Needed: The Office of Personnel needs policy guidance as to how the new system and its standards are to be applied to Agency positions.

PAY AND THE VALUE OF WORK

Problem: Within C.I.A. the concept of equal pay for substantially equal work is a farce.

There are too many employees receiving pay for grades which are higher than the value of the work they perform, through mis-slotting, PRA, etc. Other employees are performing higher grade work but cannot be promoted because the "headroom" has already been used, or due to artificial qualifications barriers. From a classifier's point of view, there are far too many overgraded positions and incumbent employees in general. The latter statement can withstand severe testing even within the restricted context of internal, Agency position to Agency position comparison.

The concept of equal pay for substantially equal work is based in part on the principle that an employee's worth in pay is represented by the value of the work he performs or produces. Work is compared on a function to function, and job to job relationship. Value is identified by measured placement within a scale of 1 to 18, the General Schedule. The grade of the position represents relative value of the work and should bear a relationship to the salary value of the employee performing the work. We have a long way to go to be able to say that our position and pay relationships meet that criteria.

I am genuinely concerned that detailed scrutiny of our position classification and position management practices by external examining officials could result in serious, negative ramifications. We would have difficulty defending some of our salaries in relation to the work performed.

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Solution Needed: This is a complex problem and I don't presume to offer specific suggestions. It is an important area of employee concern which should be brought to your attention. I do suggest that to be properly equitable there should be a requirement in the Agency for a more direct relationship between position grades and employee grades.

SALARIES, BUDGET AND POSITIONS

Problem: Related to the preceding section is concern that some elements of the Agency promote personnel beyond the limits of their budgeted grade authorizations.

My understanding of the budget process indicates that each element of the Agency is authorized funds for salaries each fiscal year. Funds for salaries are based on a distribution of position grades, with attendant salary distribution, to a maximum number of personnel authorized at each grade level, and are therefore a binding legal limitation on salary expenditures. Some components are in a nearly constant state of negative authorization because they promote personnel beyond the number authorized within those limitations. Even while in a deficit condition on grade authorization, those same components continue to hold regular promotion exercises which compound the deficit even further.

I don't pretend to know all the ins and outs of legitimate budget manipulation but, within my limited knowledge, to maintain and to compound such a salary deficit appears to be misappropriation of public funds.

Solution Needed: I raise the question as a matter of concern, but born in ignorance. I leave it to you and your budget advisors to determine whether a solution is needed.

COORDINATION OF EFFORTS AND PRODUCTS

Problem: Several Agency components perform various aspects of personnel and position management analysis. These products have merit, but are generally uncoordinated and little used.

Much of the data emanating from O/Compt, Audit Staff and PMCD are interrelated in terms of potential utility in manpower planning and justification of personnel costs. The data can be used to adjust and to justify average grade levels, upper level position restrictions (an artificial constraint if the classification process is allowed to work effectively) and related elements of concern during hearings with OMB and in Congress. The products are currently fragmented and incomplete.

Solution Needed: It would seem desirable to review the various products of the three components mentioned as they might be related to manpower and budget pressures. You might consider it appropriate to consider how the products might be improved and better used, and whether specific staff should be established to perform additional management analysis.

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PERSONNEL/POSITION POLICY REVIEW STAFF

Problem: This Agency is perhaps unique in that we have neither management analysis nor position classification review and policy control in the Office of the Director.

Absence of such functions at the most senior level indicates that the Director is not made aware of personnel, position and management effectiveness problems before they reach major proportions.

My concern in this matter is that you do not have adequate staff available to provide the information you need in these areas of concern. Lacking that capability and allowing the programs to operate at a level subordinate to one of your Deputy Directors places you in a position in which you do not have adequate control. Lack of information and lack of control in the position/personnel management areas makes you vulnerable if those programs are seriously reviewed and criticized by other than an Agency reviewer.

Solution Needed: If you accept that some or all of previously described concerns have merit and require solution, you might wish to consider establishment of a relatively small manpower policy and review staff. It would seem appropriate to place such a staff in the Office of the Comptroller and to give it specific responsibilities for policy development and review authority (including inspection) in manpower analysis and position classification compliance.

An additional function which could be a natural adjunct in such a staff is supergrade position review and justification. This is a function commonly found at the most senior levels in other agencies.

STAFFING OF THE CLASSIFICATION FUNCTION

Problem: The size of the staff assigned to PMCD tends to reinforce the impression that the functions of the Division are considered to be unimportant and are not intended to operate effectively.

This section is admittedly parochial, but is related to the foregoing as an important matter to me.

We have 17 non-supervisory professionals, three supervisors, and four clericals on the staff. The professional staff represents experience in position classification and position management ranging from two to more than 30 years each. Within the next three years we can expect to lose more than 50% of the professional experience in PMCD through retirement, reassignment or resignation. The potential losses in personnel represent approximately 80% of the most capable, most experienced personnel in the Division. With their loss there will be an even greater need for policy support and direction than is true today.

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C.I.A. has both the highest case load per classifier and the broadest, most comprehensive responsibilities of any classification shop in the Government. A normal workload of positions per classifier is in a range of 300 to 500, depending on the diversity of occupations for which the classifier is responsible. A case load of 500 positions is normally considered as a maximum. In PMCD each operating classifier is responsible for a range of from 1000 to 1500 positions, across directorate and occupational lines.

It is unusual for classification staffs in other agencies to conduct in-depth surveys on a regular basis. When they are conducted, position audits (desk side interviews) are performed on the basis of a 15-20% sample of the population being serviced. We attempt, but do not maintain a schedule of cyclical surveys with an objective of 100% coverage of the Agency in every three years. In each of our surveys there is 100% coverage of positions and personnel in the review process.

Other classification staffs are not generally responsible for position management analysis. This is normally the responsibility of a management analysis staff, which is required to coordinate its findings to determine potential classification impact. PMCD is charged with the conduct of position management surveys which are conducted by the same analysts, and at the same time as classification surveys.

Finally, unlike other organizations, we are involved in classification standards development, a function conducted by CSC for the rest of the Government.

Our combination of volume and scope of work is most unusual. The quality of the staff is generally excellent and the products are of some utility, though seldom accepted in the context they are offered. But of what value is well qualified professional staff without policy support? How can quality of product be achieved with inadequate qualified staff to perform the work effectively? THIS DIVISION COULD GAINFULLY EMPLOY 40 OR MORE PROFESSIONALS WITHIN CURRENT SCOPE OF RESPONSIBILITIES.

Under current conditions of confusion, constraints, lack of direction, insufficient resources and apparent attitudes about the function itself, this Division could be staffed by lower grade levels. We earn our keep by what we attempt to accomplish, not by our achievements.

Solution Needed: If there is to be a professional program of position and classification management, it is essential that adequate, properly qualified staff be provided to perform the scope and depth of the functions assigned.

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